

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DOUGLAS THOMAS	:	VIOLATIONS:
BRYANT BRINKLEY	:	21 U.S.C. § 841(a)(1) (possession of cocaine with intent to distribute -
	:	1 count)
	:	18 U.S.C. § 922(g)(1) (possession of
	:	a firearm by a convicted felon - 1 count)
	:	Notice of additional factors

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about September 11, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

BRYANT BRINKLEY

knowingly and intentionally possessed with intent to distribute approximately 125 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 11, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

DOUGLAS THOMAS,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Taurus 9mm semiautomatic pistol, serial number TVA31912, loaded with 10 bullets.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF ADDITIONAL FACTORS

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment,
defendant

BRYANT BRINKLEY

a. Committed an offense involving more than 100 grams of cocaine,
as described in U.S.S.G. § 2D1.1(c)(11).

b. Committed the instant offense while under a criminal justice
sentence, that is, probation, as defined by U.S.S.G. § 4A1.1(d)

2. In committing the offense charged in Count Two of this indictment,
defendant

DOUGLAS THOMAS

a. Committed any part of the instant offense subsequent to sustaining
one felony conviction of a crime of violence, as described in U.S.S.G. § 2K2.1(a)(4)(A).

b. Committed an offense in which any firearm was stolen, as
described in U.S.S.G. § 2K2.1(b)(4).

PATRICK L. MEEHAN
United States Attorney